

Andrew Iwuajoku

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OCT 18 2013	
CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
BY _____	P DEPUTY

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

Andrew Iwuajoku )

Plaintiff,

VS

CV-13-2127-PHX-NVW

UNIFUND CCR, LLC )

COMPLAINT

(FDCPA VIOLATIONS)

Defendant

COMES NOW, the plaintiff, by and through pro se undersigned and for its complaint against defendant alleges as follows

1. That plaintiff is an individual that the defendant(s) is/are resident of all have principal place of business or representative in the state of Arizona; and the obligation all actual injury which is subject of this complaint was an event caused by the defendant(s).
2. Plaintiff alleged that this court has jurisdiction over this matter and that defendant, if married where acting on behalf of their marital community for community purposes and benefit.
3. That the following debt collector knowingly harasses and injured this consumer. UNIFUND CCR LLC.
4. Defendant have refused and/or neglect to stop harassment and injury as a result of relentless phone call and wage garnishment also bank account withheld leading to schools loan in jeopardy and school work in poor level.

5 . Defendant did not validate the account in question as required on subsection 809.15 USC 1692g.

6 Defendant used false and misleading representations during this eleven months of anxieties lading process without regard to subsection 807 15 U.S.C 1692e

7.Defendant has result to use of harassmt and abusive language in violation subsection 806 15 U.SU 1692d

8 Communicates to plaintiff bank and place of work without prior authorization adding to uncomfortable feelings thereby contrary to subsection 805 15 U.S.C 1692c.

9. After all just and lawful setoffs at actual damage incurred by the plaintiff as follows:

TIME SPENT PREPARING THIS SUIT \$37.00/hr x10hours x 330 days is \$122,100.00

MEDICAL EXPENSES:	\$2,000.00
EMOTIONAL INCOVENENTS:	\$200,000.00
LOSS OF SLEEP:	\$200,000.00
WORK RELATIONSHIP:	\$150,000.00
HEADACHES:	\$200,000.00
TOTAL:	\$874,100.00

Plus interests and court fees.

10. That the plaintiff has performed on at required which entitle the plaintiff the amount contained in these complaints.

11. That a after all just and lawful set offs the Apple designated sums add justly and truly due the plaintiff.

12 Plaintiff has made demand long time ago. The harassmt and arrangements through phone call and letters as tool care for all debt owned by plaintiff.

WHEREFORE, Plaintiff prays and demands judgement against the Defendant(s), and each of them as follows:

- A. For Judgment in the amount of \$874,100.00;
- B. For judgment for accrued interest in the Amount after judgment.
- C. The accruing interest in the following for \$874,100.00 rate 10%.
- D. For all cost noted above
- E. Plaintiff court cost incurred.
- F. For interest and cost known the date hereof; and
- G. For such other and further relief as the court deems just and proper in the premises.

Respectfully submitted this October 18, 2013

Andrew Iwuajoku

Andrew Iwuajoku 10/18/13

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